

1 1990. Isn't that correct?

2 A I don't know that, sir. I don't know what date we  
3 actually started transmitting.

4 Q But that -- I appreciate that, Mr. Harrison. It has  
5 been many years, but that wasn't my question. I wasn't asking  
6 you what date the station went on the air. I'm asking you to  
7 read this paragraph again very carefully, and it seems to me  
8 that you're saying that the PCP system was operating in the  
9 latter part of 1990. Isn't that correct?

10 A I don't know if it was operating or not, sir.

11 Q Well, Mr. Harrison --

12 JUDGE CHACHKIN: Where is there anything in this  
13 paragraph that says it was operating or even gives the  
14 impression it was operating? It says it was contacted after  
15 they received their license. It doesn't say anything about  
16 operating. I don't see anything here which infers they were  
17 operating at that time.

18 MR. JOYCE: Let me ask the question, if I may, Your  
19 Honor.

20 BY MR. JOYCE:

21 Q Why, Mr. Harrison, why would you swear out in a  
22 declaration under oath that you were talking to the Greenup  
23 County Ambulance Service or Rescue Squad about providing them  
24 PCP system -- service unless your service was operating?

25 A I talked to a member of the Rescue Squad who was

1 already an RCC customer and he knew that we had been trying to  
2 get the license, and I told him that I would agree to try to  
3 serve him on a private carrier system.

4 Q And the period of time that we're referring to, so  
5 there's no confusion, is the latter part of 1990. Isn't that  
6 correct?

7 A Yes.

8 Q And so that I'm not thoroughly confusing everybody  
9 in this room, Mr. Harrison, are you aware of the fact that RAM  
10 Technologies has complained about interference to its 152.480  
11 frequency in the latter part of 1990?

12 A No, sir.

13 Q You're not aware of that fact?

14 A I always thought that was 1991. The latter part of  
15 1991 is when the interference was.

16 Q What gave you that impression?

17 A In the first paragraph, the bottom line, the last  
18 sentence says that, "Capitol should pay a fine of \$20,000 for  
19 improper operation of WNSX 646 from August 12 to 15, 1991."

20 Q So you can't recall whether or not RAM complained  
21 about interference in the latter part of 1990?

22 A No, sir.

23 MR. HARDMAN: Your Honor, there's no foundation for,  
24 for any suggestion that this witness ought to know that and  
25 there's certainly nothing in his testimony about that subject.

1 JUDGE CHACHKIN: Do you have a foundation that this  
2 witness should have known about those complaints in the end of  
3 1990?

4 MR. JOYCE: If Mr. Hardman wants me to lay the  
5 foundation, I can, Your Honor.

6 JUDGE CHACHKIN: Well, if you can with this witness,  
7 go ahead. You haven't done it yet.

8 MR. JOYCE: Mr. Harrison, I presume that since you  
9 were -- and I apologize if I was being presumptuous, but since  
10 you're in charge of this office I presume you're also familiar  
11 with interference problems on the shared 152.480 frequency.  
12 Isn't that correct?

13 MR. HARRISON: Yes, sir.

14 MR. JOYCE: Do you still have an objection, Mr.  
15 Hardman?

16 JUDGE CHACHKIN: Well, you still haven't established  
17 that he knew of complaints made at the end of 1990. I mean, I  
18 don't know if you complained to the FCC. I don't know if they  
19 contacted them. You haven't established that anybody at RAM  
20 contacted him, so I don't, I don't know where you've laid a  
21 foundation that he should have known about it.

22 BY MR. JOYCE:

23 Q Mr. Harrison, did you have personal knowledge of any  
24 interference complaints that were made by RAM Technologies at  
25 any time concerning the 152.480 frequency?

1           A     Yes, sir.

2           Q     Do you recall when those complaints began?

3           A     No, sir.

4           Q     So is it fair to say that it's possible that those  
5 complaints could have occurred in the latter part of 1990 but  
6 you simply don't recall?

7           JUDGE CHACHKIN: Anything is possible. I mean, the  
8 question is did anybody from RAM call anybody from Capitol at  
9 the end of 1990? I mean, we haven't established any  
10 foundation that anybody at Capitol would know about any  
11 problems.

12           MR. JOYCE: Ray Bobbitt testified to that effect  
13 just yesterday, Your Honor.

14           JUDGE CHACHKIN: Testified to what?

15           MR. JOYCE: That there was complaints about  
16 interference.

17           JUDGE CHACHKIN: To whom? Who did he speak to? I  
18 thought he testified he didn't speak to anybody at RAM.

19           MR. JOYCE: He didn't say -- he said that complaints  
20 -- that there were complaints and Dale Capehart himself  
21 testified to this earlier in the week, as well.

22           JUDGE CHACHKIN: The question is if they didn't  
23 contact Capitol and tell them about it, how are they supposed  
24 to know about it?

25           MR. JOYCE: Your Honor, if I may be given some

1 liberty --

2 JUDGE CHACHKIN: Well, I'm saying --

3 MR. JOYCE: -- to cross-examine this witness?

4 JUDGE CHACHKIN: I understand that, but you have to  
5 establish a foundation that somehow he should have known about  
6 -- that there was a problem at RAM at the end of 1990. You  
7 haven't done that yet.

8 MR. JOYCE: I have some other purposes to my cross-  
9 examination.

10 JUDGE CHACHKIN: Fine, but you still haven't laid a  
11 foundation that he should have known that there were problems  
12 at the end of 1990. Go ahead.

13 MR. JOYCE: The purpose of my cross-examination,  
14 Your Honor, is to try to determine when Capitol was -- when  
15 there was a possibility that Capitol was operating, when there  
16 was a possibility that Capitol could have caused harmful  
17 interference on the 152.480 frequency. Now, I don't think I  
18 have to telegraph to Mr. Hardman where I'm going on cross-  
19 examination for these to be proper --

20 JUDGE CHACHKIN: That may be so, but you're asking  
21 about complaints. Complaints means someone was complaining.

22 MR. JOYCE: You asked me to ask about complaints.

23 JUDGE CHACHKIN: No. You asked the question about  
24 complaints of interference.

25 MR. JOYCE: I didn't ask --

1 JUDGE CHACHKIN: You asked about complaints of --  
2 you, you specifically asked the question, "You didn't know  
3 anything about complaints?

4 MR. JOYCE: I said interference. I did not say  
5 complaints, Your Honor.

6 JUDGE CHACHKIN: I don't recall you asking any  
7 questions about interference. All the questions were  
8 complaints by RAM. Let's go on.

9 MR. HARDMAN: Your Honor, if I may, the witness was  
10 asked about whether he knew Capitol was operating a PCP system  
11 in the fall of 1990. He said he didn't know. Okay? There is  
12 testimony in Mr. Raymond's direct statement about when the  
13 operation and under what circumstances. Now, I have no  
14 problem with Mr. Joyce testing this witness' credibility, but  
15 he certainly didn't testify to it on direct and the -- it  
16 seems to me that if they're going to attack that, the place to  
17 do it is when Mr. Raymond testifies.

18 JUDGE CHACHKIN: Go ahead.

19 MR. JOYCE: If I may continue, Your Honor.

20 JUDGE CHACHKIN: Go ahead.

21 BY MR. JOYCE:

22 Q Mr. Harrison, would you look in front of you to --  
23 in that stack of papers there behind Tab No. 11? Could you  
24 identify that document for me?

25 A Can I identify it?

1 Q Yes. Just tell me what it appears to be to you.  
2 A A letter from the law offices of Ken Hardman.  
3 Q And what's the date of that letter?  
4 A December 4th of 1990.  
5 Q Could you tell us who this letter is made out to?  
6 A Ms. Carol Fox Foelak.  
7 Q That's Chief of the Compliance Branch, Private Radio  
8 Bureau? Is that correct?  
9 A Yes, sir.  
10 Q And you see where it says in the first sentence,  
11 "This afternoon I received in the mail a copy of a letter  
12 dated November 28, 1990 from Frederick M. Joyce, counsel for  
13 RAM Technologies, Inc., to Ms. Carol Fox Foelak?" Do you see  
14 that sentence?  
15 A Yes, sir.  
16 Q Do you see it says, "In that letter RAM makes  
17 certain allegations of misconduct by my client, Capitol Radio  
18 Telephone Company, Inc., d/b/a Capitol Paging?" Do you see  
19 that?  
20 A Yes.  
21 Q Do you see where it says, "The letter was delayed in  
22 arriving at my office because it was sent to an incorrect  
23 address despite the fact that my correct address is reflected  
24 in the record in the proceedings in file number 0190207 in  
25 which Mr. Joyce is contesting the grant of a PCP license on

1 152.48 to Capitol Paging and which is also the subject in part  
2 of Mr. Joyce's letter?" Do you see that?

3 A Yes.

4 Q And in the next paragraph where it says, "In any  
5 event, Capitol Paging absolutely and categorically denies  
6 RAM's allegations?" Do you see that?

7 A Yes.

8 Q And then there's a reference in that paragraph to a  
9 declaration of J. Michael Raymond. Do you see that?

10 A Yes.

11 Q All right. Now, if you turn the page that's the  
12 declaration of J. Michael Raymond, is it not?

13 A Yes, sir.

14 Q And if you take a look in the first paragraph --

15 JUDGE CHACHKIN: Well, let's not read the  
16 declaration. The question is whether he saw he was involved  
17 in this or something. You could ask these questions of Mr.  
18 Raymond. First you have to establish that somehow he knew  
19 about these things.

20 MR. JOYCE: All right.

21 BY MR. JOYCE:

22 Q Take your time, Mr. Harrison, and I'd like you to  
23 read through the declaration of J. Michael Raymond because it  
24 pertains to allegations of harmful interference and it's  
25 executed the 4th day of December 1990 and I want to ask you a



1 question about this in your knowledge. Have you read it?

2 A Yes, sir.

3 Q Now, you were in charge of the Huntington office at  
4 this time? Is that correct?

5 A Yes, sir.

6 Q Do you remember talking to Mr. Raymond about these  
7 allegations now? Does this help refresh your recollection?

8 A No, sir.

9 Q No, you don't remember talking to him or you simply  
10 did not talk to him?

11 A I don't know that I did about this actual  
12 declaration.

13 Q My question was poorly put and I may have confused  
14 you. I apologize. Do you recall -- does this help refresh  
15 your recollection as to whether or not there might have been  
16 interference problems on the 152.480 frequency in November or  
17 December of 1990?

18 A No, sir.

19 Q Getting back to your declaration, Mr. Harrison, I'm  
20 trying to understand why you were talking to the Greenup  
21 County Rescue Squad about paging service in the latter part of  
22 1990 if you're saying your station didn't become operational  
23 until sometime in 1991.

24 MR. HARDMAN: Your Honor, I'm going to object.

25 That's a total mischaracterization of this witness' testimony.

1 He testified that -- was an RCC customer and Capitol was  
2 operating its RCC paging system at the time, so Mr. Joyce's  
3 question which says that Capitol wasn't operating a system, a  
4 paging service, is totally improper characterization of the  
5 record.

6 MR. JOYCE: His declaration says, "I agree to --  
7 them on the new PCP system." Now, either I've gone blind or  
8 dumb or both, but I think it's perfectly proper for me to talk  
9 to him about the PCP system services the latter part of 1990  
10 and I'm getting tired of these interruptions.

11 MR. HARDMAN: Well, I have no objection if he asks  
12 what this witness knows about the existence or timing or  
13 whatever about the PCP. Whatever he wants to do, that's fine,  
14 but his questions continue to imply facts neither stated nor  
15 implied in this declaration, and the only proper form for  
16 those types of question is he is testing this witness'  
17 credibility and that's not what he's doing.

18 BY MR. JOYCE:

19 Q I'm trying to find out when, Mr. Harrison, you were  
20 testing this PCP service for the Greenup County Rescue Squad,  
21 and it appears to me, and you're here now and you're welcome  
22 to clarify this, but it appears to me from this paragraph that  
23 you were trying to provide them service in the latter part of  
24 1990. Isn't that correct?

25 A No, sir. The very next paragraph states in the

1 spring of 1991, when I thought the system was ready, then we  
2 tried to start testing to see if it would work for them.

3 Q All right. Fine. So it took you several months  
4 from the time that the Greenup County Rescue Squad contacted  
5 you before you were able to provide them PCP service?

6 A Yes, sir.

7 Q Was it three months? Do you recall?

8 A I don't know, sir.

9 Q Was it 12 months?

10 A I don't know, sir.

11 Q You have absolutely no idea between the time the  
12 Greenup County Rescue Squad contacted you about the service  
13 until the time that you were actually being able to provide  
14 them service, you have no recollection of how long that took?

15 A I actually started their billing on 9/1 of '91.  
16 That's when we had the system working officially enough to  
17 charge somebody for it I thought.

18 Q September of 1991?

19 A Yes, sir.

20 Q Okay. How many people are we talking about in the  
21 Greenup County Rescue Squad?

22 A I don't know how many members they have, but I was  
23 contacted about -- first got 10 pagers and then like a day  
24 later they got 5, so there was 15 total, but I don't know how  
25 many members are in the fire department or rescue.

1           Q     I'm not trying to, to test your recollection, Mr.  
2 Harrison, but I presume when they contacted you they gave you  
3 an idea of how many paging units they were going to need.  
4 Isn't that correct?

5           A     Yes, sir.

6           Q     All right. So was it roughly 10 paging units that  
7 -- to the best of your recollection?

8           A     Or 15. Or 15.

9           Q     10 or 15. And those discussions that you had about  
10 their interest in receiving this service were in the latter  
11 part of 1990 according to this. At least we have established  
12 that. Correct?

13          A     That's when the first contact was initially made,  
14 yes.

15          Q     December, January, February, March, April, May,  
16 June, July, August, September. Ten months later is about when  
17 you began providing them the service? Is that correct?

18          A     That's when we started billing them for it.

19          Q     Okay.

20          A     They had the pagers prior to that, but they would  
21 test and I would test. We never got it to work good enough  
22 that we could actually bill for it. We were still in the  
23 testing phase.

24          Q     So operational service wasn't provided to them until  
25 about ten months later? Is that fair to say?

1           A     Yes, sir.

2           Q     Okay. I presume this wasn't emergency service that  
3 you were providing to them? Is that fair to say?

4           A     That was the purpose, was because they were going to  
5 have to be contacted when there was a fire or an emergency.  
6 That's why it had to be working perfect before they could  
7 utilize it.

8           Q     But you had a perfectly good operating RCC paging  
9 system in place already which you also managed in that office,  
10 did you not?

11          A     Yes, sir.

12          Q     Which is why I'm confused, Mr. Harrison, because I  
13 would think if I run an ambulance squad and communications is  
14 so critical to our services, I would think that a ten month  
15 delay in receiving service would be unacceptable. Isn't that  
16 logical?

17          A     They had their own -- the volunteer fireman pagers  
18 have their own type of pager. They wanted something that  
19 would give them more range. They had very limited range with  
20 theirs and we were trying to get something that would give  
21 them more range, give them more freedom, and volunteer fire  
22 departments are strictly donations, don't have a lot of  
23 funding and they couldn't afford to pay us our tariff on our  
24 RCC system.

25          Q     So they had their own private paging system?

1           A     I don't know that it was private, but they had their  
2 own, some type of paging system at the time, yes.

3           Q     It wasn't provided by Capitol?

4           A     No, sir.

5           Q     And to your knowledge it wasn't provided by RAM  
6 Technologies?

7           A     I don't have any idea, sir.

8           Q     Do you know on what frequency that operated?

9           A     No, sir.

10          Q     Well, didn't, didn't they hand in their, their  
11 paging units to you so you could recrystallize them onto your  
12 frequency?

13          A     No, sir.

14          Q     Well, how did that work?

15          A     I beg your pardon, sir?

16          Q     I'm trying to get an idea of how it was that Capitol  
17 intended to provide service to them. I presume these  
18 volunteer members had their own paging units? Is that  
19 correct?

20          A     Yes, sir.

21          Q     Okay. But you didn't know on what frequency they  
22 were?

23          A     No, sir.

24          Q     Okay. So you planned on giving them paging units?

25          A     Yes, sir.

1 Q Okay. Were these going to be tone and voice paging  
2 units, do you recall?

3 A Yes, sir.

4 Q Did you tell these folks in the latter part of 1990  
5 that it might be ten months before the service would be  
6 operational?

7 A I worked with a gentleman from there and we  
8 discussed quite a bit that it would take some time until we  
9 got it fully ready.

10 Q Were you employed with -- well, I was going to ask  
11 you if you were employed with Capitol when they first started  
12 their RCC paging system until I remembered that they've been  
13 in business for 30 years. Isn't that true?

14 A Yes.

15 Q So I gather you weren't with them when they started  
16 their RCC?

17 A No.

18 Q Are you a technician in any way, Mr. Harrison?

19 A No, sir.

20 Q So you wouldn't know what would be considered the  
21 typical time for setting up a PCP system, I guess, would you?

22 A No, sir.

23 Q Now, I want to talk about the testing that was going  
24 on and, so that Mr. Hardman doesn't complain that I'm  
25 mischaracterizing your testimony, is it fair to say that this

1 testing then was going on for the latter -- throughout 1991 up  
2 until approximately September of 1991? Was that your  
3 testimony?

4 A I don't really know exactly date it started, but as  
5 soon as I was aware the system as far as the technical part  
6 was operational that's when I started testing.

7 Q Okay. What's involved in a typical test?

8 A You program the pager, dial the phone number on it  
9 see if it works.

10 Q And presumably the test page would be sitting in  
11 front of you so you can that it's working? Correct?

12 A Sometimes, yes, sir.

13 Q And every once in awhile you'd have somebody go out  
14 in the field so you can see how far you can send the signal?  
15 Is that correct?

16 A Yes.

17 Q How long would that test take to see if that pager  
18 would be activated?

19 A Depending on how long it took the air time to get  
20 clear for the page to go off. It could be ten minutes. I  
21 could be three or four hours.

22 Q Okay. But if there was a three or four hour delay  
23 in that test page going out to that page unit it doesn't mean  
24 it's shutting down the 152.480 frequency for three hours, does  
25 it?



1           A     I don't understand.

2           Q     Okay.  It wasn't a well put question because I'm not  
3     versed in this stuff.  When you say that the test could have  
4     taken three hours, you're not saying that your -- you would  
5     have seized the channel, that you'd be transmitting  
6     consistently for three hours, do you?

7           A     Oh, no, sir.

8           Q     I mean, that -- you dial up that test page unit  
9     saying it goes out in a split second, right?

10          A     No, sir.  That's a shared frequency and we had to  
11     wait our turn and sometimes it would appear to be three hours  
12     before we'd get our turn.

13          Q     I understand that and, again, I'm confusing you  
14     because of my improper use of the terminology.  What I meant  
15     was the test itself, to test that a pager is going to be  
16     activated, the various part of it are to dial that pager  
17     number?  Correct?

18          A     Yes, sir.

19          Q     And simply to wait and see if the pager gets  
20     activated?  Correct?

21          A     Well, you activate the pager from the computer, but  
22     to see if the pager is going to work, if the system's going to  
23     work, you basically have to, yes, sir, sit there and wait and  
24     see if the pager goes off.

25          Q     Okay.  And that -- so that I can try to define what

1 the test is, the test is to see if the radio signal will reach  
2 the paging unit?

3 A Yes, sir.

4 Q Okay. That radio signal itself takes how long once  
5 it actually gets out on the air?

6 A I have no idea, sir.

7 Q But it doesn't take five minutes presumably?

8 A It shouldn't sir, no.

9 Q It doesn't take 24 hours presumably?

10 A No, sir.

11 Q I also presume you wouldn't test with -- for the  
12 most part, you wouldn't test with an actual -- with a number  
13 or a cap code that was assigned to a paying customer, would  
14 you?

15 A If he just got the pager just in, yes. I test every  
16 pager before it leaves my office --

17 Q Sure.

18 A -- no matter what system.

19 Q You test it there, be sure it works --

20 A Yes, sir.

21 Q -- and you give it to the customer and you hope he  
22 pays?

23 A Yes, sir.

24 Q And then only if they come back to you and they  
25 complain about the service --

1           A     Yes, sir.

2           Q     -- you might test it again?

3           A     Yes, sir.

4           Q     Okay. Now, I guess when you were testing your PCP  
5 system you had to talk to folks like Mr. McCallister, your  
6 technician? Is that correct?

7           A     I don't talk to Mr. McCallister a lot. Mike  
8 Raymond's my direct boss and I relay messages to Mike and then  
9 Mike would get with Billy McCallister.

10          Q     Oh, okay. So, so you don't really know how long it  
11 took that technician, Mr. McCallister, to put up your PCP  
12 system or not, do you?

13          A     No, sir.

14          Q     And you don't know why it took ten minutes -- ten  
15 months to get your PCP system operating properly, I presume?

16          A     No, sir.

17          Q     Would -- Now, I think you've already said that you  
18 were involved in the, the testing of the new PCP system in  
19 some way. Isn't that correct?

20          A     Yes, sir.

21          Q     Okay. Would part of that test involve sending out  
22 Morse Code IDs?

23          A     I have no way of sending out Morse Code IDs, sir,  
24 no.

25          Q     The transmitter does that automatically?

1           A     Yes, sir. It has to ID ourselves to show who we  
2 are.

3           Q     So that is not a test, that, that aspect of the  
4 paging operation, the, the Morse Code ID? That's actually not  
5 a test pattern, if you will?

6           A     Not that I'm aware of, sir, no.

7           Q     When you were testing the PCP system did you send  
8 out a series of tones repeated over and over again for a 24  
9 hour period?

10          A     There was -- when we chained it -- trying to get the  
11 chain pagers together, when you call one the first pager goes  
12 off and then it goes down the chain. Supposedly it sets off  
13 No. 1 through No. 15 and there were times that -- the only way  
14 you can send out something they got on a voice pager is to not  
15 say anything in it or have the computer send the tone, but I  
16 did not ever send tones out over a 24 hour period, no, sir.

17          Q     It's an interesting answer, Mr. Harrison, because I  
18 hadn't mentioned -- I hadn't gotten into chaining pages yet,  
19 but we can get to that. My question was when you were testing  
20 the PCP system for this ten month period --

21          A     Right.

22          Q     -- in 1991, as part of that test did you send out a  
23 repeat tone over and over again for a 24 hour period?

24          A     Now, there was one time, as it says in my  
25 declaration, when we were trying to get the chain to work.

1 There was a time that it was left on overnight, but nothing  
2 was ever done for 24 hours at a time, no, sir.

3 Q Does it say somewhere -- in your declaration do you  
4 use the word chain, Mr. Harrison?

5 A I think it might be referred to as group call in my  
6 testimony.

7 Q Well, why do you -- why are you using the word  
8 chain?

9 A Because that's actually on the computer, what the  
10 computer asks me, if I want to chain. It doesn't say do I  
11 want to group call. It says do you want to chain this pager  
12 to another chain -- to another pager?

13 Q I know, but since I hadn't used it in my question,  
14 Mr. Harrison, I guess I was kind of curious as to why you've  
15 been using that terminology. Did you this week talk to Mr.  
16 Raymond about that term, the chain command?

17 A No, sir.

18 Q Did you talk to Mr. Hardman about that term, the  
19 chain command?

20 A No, sir.

21 Q In paragraph 3 of your Mr. -- of your declaration,  
22 Mr. Harrison, the bottom of it, it says, "We first tried to  
23 make it work" -- by that I think you're referring to this  
24 group call function -- "to make it work with Ashland numbers,  
25 then with Huntington numbers, then with Charleston numbers and

1 then with 800 numbers."

2 A Yes, sir.

3 Q Is that correct?

4 A Yes, sir.

5 Q But now the -- and are you using this term group

6 call to be the same as chain?

7 A Yes, sir.

8 Q Okay. But now the group call or the chain function

9 is something in the paging terminal? Is that correct?

10 A When you program the pager, yes, sir.

11 Q You program the pager to have that particular type

12 of a function?

13 A Yes, sir.

14 Q But this sentence here where you're talking about

15 problems you were having in getting that function to work,

16 when you say Ashland numbers and Huntington numbers and

17 Charleston and then 800 you're referring to telephone numbers,

18 aren't you?

19 A Yes, sir.

20 Q Well, I'm not an engineer and we know I'm not the,

21 the brightest person in this hearing room, Mr. Harrison, so

22 you're going to have to explain to me what a telephone number

23 has to do with whether or not the terminal's group call or

24 chaining function was working properly.

25 A Well, just because you tell a computer to chain it,

1 you still have to dial a phone number to set the pager off.  
2 Okay? And my system is not the main center of our system.  
3 I'm like a branch office so most of my equipment, and me not  
4 being a technician, has been run and I was told that maybe  
5 through our networking that that's why we tried the different  
6 numbers because the Charleston numbers and the 800 numbers and  
7 the Huntington all went through a different system than the  
8 Ashland phone numbers.

9 Q I'm afraid I still don't get the connection, Mr.  
10 Harrison.

11 A I really don't know how to explain it any different.  
12 I tried the Huntington numbers and they didn't work or the  
13 Ashland numbers. Then I tried --

14 Q And then -- let's break it down. When you say you  
15 tried the numbers, you tried to dial what Mr. Raymond gave you  
16 as a list of paging numbers? Is that correct?

17 A Well, there was one number for the chain and you  
18 dialed the one phone number and it would go down and set off  
19 No. 1 through No. 15.

20 Q I follow.

21 A But you still have to actually dial a phone number  
22 unless you send it -- there's only two ways to set a pager off  
23 that I know of, I'm aware of, is either through the computer  
24 or through a telephone number.

25 Q Who gave you those numbers to, to call?

1           A     We get blocks of a hundred numbers in a row.

2           Q     No, but I mean you wouldn't just randomly dial a  
3 number unless there was a --

4           A     It's the one you program and assign to it in the  
5 computer.

6           Q     I mean, you wouldn't be testing a pager unless it's  
7 one of your pagers?

8           A     Yes, sir.

9           Q     When you say you're given a block of numbers, you  
10 mean the manufacturer of the paging equipment gives you pagers  
11 with a block of numbers?

12          A     We buy the numbers from the local phone company.

13          Q     Oh, okay. My confusion again. So you're talking  
14 about a block of numbers, let's say 857-0100 through 857-0200?

15          A     Yes, sir.

16          Q     Correct. So all those numbers from 100 to 200 are  
17 assigned to paging units? Is that correct?

18          A     Yes, sir.

19          Q     And then the paging unit itself has to be programmed  
20 with the cap code so that if I dial 857-0100, 01 -- you know,  
21 0100, it will activate the cap code that's assigned to it?

22          A     Yes, sir.

23          Q     So the telephone company gives you these numbers  
24 you're referring to, the Ashland numbers, Huntington and  
25 Charleston? Correct?



1           A     Yes, sir.

2           Q     Okay. But then somebody had to give you paging  
3 units that were associated with those numbers? Correct?

4           A     I don't think I understand your question, sir.

5           Q     All right. Well, for this test to make sense, you  
6 wouldn't just randomly dial numbers unless they were  
7 associated with the Capitol paging unit? Correct?

8           A     Yes, sir.

9           Q     So before you did all this testing I presume you  
10 determined in some way, shape or form that those were  
11 associated with a Capitol customer? Correct?

12          A     I don't think I understand your question, sir.

13          Q     All right. And it's poorly put, I'm sure. When you  
14 were doing all this testing of the group calling you had these  
15 telephone numbers. I presume you also, as you said earlier  
16 when you tested paging units, you have it sitting in front of  
17 you so you know whether or not it goes off? Correct?

18          A     Sometimes, yes, sir.

19          Q     You didn't say sometimes earlier, but I'll accept  
20 the answer. Now, for you to determine whether or not this  
21 group call option is working you'd have to do the same thing,  
22 wouldn't you?

23          A     Yes, sir.

24          Q     You'd have to have those paging units sitting there  
25 so you could hear them go off? Correct?